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*Attorneys for Plaintiffs Liberty Insurance Corporation  
And LM General Insurance Company*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

LIBERTY INSURANCE CORPORATION, a  
foreign corporation, and LM GENERAL  
INSURANCE COMPANY, a foreign  
corporation,

Plaintiffs,

v.

YVONNE BRODEUR, an individual; JERRY  
BRODEUR, an individual; ELIAS  
MENESES.

Defendants.

**Case No. 2:19-cv-00457-APG-VCF**

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
DEFENDANTS' MOTION TO ALTER  
OR AMEND, FOR RELIEF FROM, AND/  
OR RECONSIDERATION OF THE  
REVISED FINDINGS OF FACT,  
CONCLUSIONS OF LAW, AND ORDER  
FOR ENTRY OF JUDGMENT OF  
JANUARY 30, 2023 AND/OR NEW  
TRIAL PURSUANT TO FED. R. CIV. P.  
59(E) AND 60(B)**

**(First Request)**

Plaintiffs Liberty Insurance Corporation and LM General Insurance Company, by and through their counsel, Clyde & Co US LLP, and Defendants Yvonne Brodeur and Jerry Brodeur, by and through their counsel, Bowen Law Offices submit this Stipulation and [Proposed] Order to Extend Time to Respond to Defendants' Motion to Alter or Amend, for Relief From, and/or Reconsideration of the Revised Findings of Fact, Conclusions of Law, and Order for Entry of Judgment of January 30, 2023 and/or New Trial Pursuant To Fed. R. Civ. P. 59(E) And 60(B) (herein "Motion").

The parties are attempting to resolve the lawsuit and believe that a settlement is possible within the next couple weeks. In order to facilitate that potential resolution, the parties have agreed

1 to stay the time to respond to the Motion for 14 days, so that the resources can be conserved and  
2 directed towards a case resolution.

3 Therefore, the parties agree that the new deadline to respond the Motion is **March 27, 2023**.

4 This is the first request by the parties to extend the time for Plaintiffs to respond the Motion.

5  
6 Respectfully submitted,

7 Dated this 3<sup>rd</sup> day of March 2023.

8 **BOWEN LAW OFFICES**

8 **CLYDE & CO US LLP**

9 By: /s/ Jerome R. Bown  
10 Jerome R. Bowen, (NV Bar No. 4540)  
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Las Vegas, NV 89129

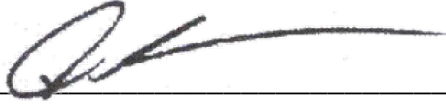
9 By: /s/ Dylan P. Todd  
10 Amy M. Samberg (NV Bar No. 10212)  
11 Dylan P. Todd (NV Bar No. 10456)  
Lee H. Gorlin (NV Bar No. 13879)

12 *Attorney for Defendants Yvonne*  
13 *Brodeur and Jerry Brodeur*

12 *Attorneys for Plaintiffs*  
13 *Liberty Insurance Corporation and LM General*  
14 *Insurance Company*

15 **ORDER**

16  
17 The above Stipulation **IS SO ORDERED**.

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21 UNITED STATES DISTRICT JUDGE  
22 DATED: March 6, 2023  
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